STATE OF WASHINGTON
GAMBLING COMMISSION

In the Matter of:

AHN M. CHINN
License No. 68-10286,

Licensee.

NO. CR 2017-01351

STIPULATED SETTLEMENT
AGREEMENT

The Washington State Gambling Commission represented by its attorneys, ROBERT W. FERGUSON, Attorney General, KELLEN WRIGHT, Assistant Attorney General, and its Director, DAVID TRUJILLO, and the Licensee, AHN M. CHINN hereby enter into this stipulation and settlement agreement for Case Number CR 2017-01351.

I. INTRODUCTION

In the above-referenced case, the Washington State Gambling Commission issued a Summary Suspension and Notice of Administrative Charges dated January 14, 2019, alleging that Ms. Chinn committed loan sharking and money-laundering, and that this conducted warranted revocation of her Public Card Room Employee (PCRE) gambling license, License Number 68-10286, under RCW 9.46.153(1); RCW 9A.83.020, RCW 9.46.190, RCW 9.46.180, RCW 9.46.185, WAC 230-15-180(1) and (2), RCW 9A.82.030, RCW 9A.82.045, RCW 9A.82.010, WAC 230-06-035, RCW 9.46.075(1), (8), and (10); and WAC 230-03-085(1), (3), and (9).

II. AGREEMENT OF THE PARTIES

The Gambling Commission and the Licensee agree to the following:

STIPULATED SETTLEMENT AGREEMENT
IN RE: AHN M. CHINN
NO. 2017-01351

1

Washington State Gambling Commission
4565 7th Avenue S.E., Lacey, WA 98503
P.O. Box 42400
Olympia, WA 98504

1.   1.   The Washington State Gambling Commission and the Licensee enter into this

2. agreement to avoid the time and expense of further litigation.

3.   2.   The Licensee explicitly waives the right of further administrative review of all

4. matters related to the above-referenced Administrative Charges.

5.   3.   The Licensee does not admit to the facts or violations alleged in the above-

6. referenced Administrative Charges. However, the Licensee agrees that, were this matter to

7. proceed to hearing, there is a substantial likelihood that the Washington State Gambling

8. Commission would be able to prove that it had the authority to revoke the Licensee's PCRE

9. gambling license under RCW 9.46.153(1); RCW 9A.83.020, RCW 9.46.190, RCW 9.46.180,

10. RCW 9.46.185, WAC 230-15-180(1) and (2), RCW 9A.82.030, RCW 9A.82.045, RCW

11. 9A.82.010, WAC 230-06-035, RCW 9.46.075(1), (8), and (10); and WAC 230-03-085(1), (3),

12. and (9).

13.   4.   The parties agree that the Washington State Gambling Commission will consider

14. that the violations set forth in the Notice of Administrative Charges, as specified in the above

15. paragraphs, have been sustained and will become a part of the Licensee's licensing record.
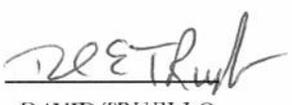
16.   5.   The Licensee agrees to the revocation of her license as of the date of signing of

17. this agreement, and acknowledges that the Washington State Gambling Commission will

18. consider her license revoked effective on the date of signing of this agreement. Upon signing

19. this settlement agreement, the parties agree that the Licensee will not be authorized to engage in

20. any PCRE or Class III gambling activities unless she applies for and receives a new gambling

21. license.

22.   6.   In the event the Licensee subsequently applies for certification or a gambling

23. license, she will be subject to all the Washington State Gambling Commission's investigative

24. procedures for processing such application. Furthermore, no promises or assurances have been

25. made to the Licensee that she will receive a license or certification from the Washington State

26. Gambling Commission should she apply.

STIPULATED SETTLEMENT AGREEMENT   2
IN RE: AHN M. CHINN
NO. 2017-01351

Washington State Gambling Commission
4565 7th Avenue S.E., Lacey, WA 98503
P.O. Box 42400
Olympia, WA 98504

7.   The Licensee agrees that she shall have no involvement whether paid or unpaid, in the ownership, operation, or financing of any activity regulated by the Washington State Gambling Commission. This does not prevent the Licensee from working in non-gambling related employment at an establishment engaged in authorized gambling activities or in Class II tribal gaming activities.

8.   This agreement constitutes the final written expression of all the terms of this agreement and is a complete and exclusive statement of these terms.

DAVID TRUJILLO   3-13-19
Director   DATE
Washington State Gambling
Commission

AHN M. CHINN   2/4/19
Licensee   DATE

STIPULATED SETTLEMENT AGREEMENT   3
IN RE: AHN M. CHINN
NO. 2017-01351

Washington State Gambling Commission
4565 7th Avenue S.E., Lacey, WA 98503
P.O. Box 42400
Olympia, WA 98504